

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

JANE DOE 2,	)	
	)	
Plaintiff,	)	Civil Action No. 3: 2023-cv-00582
	)	
v.	)	
	)	
JIMMIE ALLEN, AADYN’S DAD	)	JUDGE ALETA A. TRAUGER
TOURING, INC., CHARLES HURD, and	)	
JOHN DOES 1-100,	)	
	)	
	)	
Defendants.	)	
	)	

**PLAINTIFF’S MOTION FOR SANCTIONS AND JUDGMENT  
AGAINST DEFENDANTS JIMMIE ALLEN AND AADYN’S DAD TOURING, INC.**

Pursuant to Federal Rules of Civil Procedure 16(f) and 37(b), and this Court’s inherent discretion, Plaintiff respectfully requests that this Court enter judgment against Defendants Jimmie Allen and Aadyn’s Dad Touring, Inc. While Plaintiff recognizes that judgment against Defendants is a drastic sanction, it is warranted here where: (i) Defendants have not complied with multiple Court Orders, issuing a litany of excuses but failing to seek relief from the Court and thus evincing bad faith; (ii) Plaintiff has been prejudiced, which is multiplied given the parties are just 30 days until trial; (iii) Defendants have been on notice of risk of judgment both through this Court’s prior orders and Plaintiff’s multiple motions seeking court intervention; and (iv) a less drastic sanction is not likely to compel compliance, given that this Court has already dismissed Defendant Allen’s

counterclaim when he failed to produce his cellphone and Defendants have ignored this Court's Orders to replace counsel and pay costs.

WHEREFORE, for the reasons more fully set forth in the accompanying memorandum and declaration, Plaintiff Jane Doe respectfully requests that this Court grant her motion for sanctions, enter judgment against Jimmie Allen and Aadyne's Dad Touring, Inc., and set a deadline for Plaintiff to submit her proof of damages. Plaintiff also respectfully requests that this Court, in the interim, suspend the trial date and impending pre-trial deadlines.

Dated: May 27, 2025

*Counsel for Plaintiff:*

/s/ Elizabeth A. Fegan  
Elizabeth A. Fegan (admitted *pro hac vice*)  
FEGAN SCOTT LLC  
150 S. Wacker Drive, 24th Floor  
Chicago, IL 60606  
(312) 264-0100  
beth@feganscott.com

John T. Spragens (BPR # 31445)  
SPRAGENS LAW PLC  
311 22nd Ave. N.  
Nashville, TN 37203  
(615) 983-8900  
john@spragenslaw.com

**CERTIFICATE OF SERVICE**

I, Elizabeth A. Fegan, an attorney, caused the foregoing to be filed on May 27, 2025 via the Court's electronic filing system which will serve all counsel of record, including:

Alandis K. Brassel (BPR # 34159)  
BRASSEL LAW PLLC  
1033 Demonbreun Street, Suite 300  
Nashville, TN 37203  
(615) 258-8900  
alandis@brassel.law

Robert Housman (admitted *pro hac vice*)  
9001 Clifford Ave  
Chevy Chase, MD 20815  
(202) 486-5874  
rhousman@bookhillpartners.com

*Counsel for Defendants Jimmie Allen and  
AadyN's Dad Touring, Inc.*

By: /s/ Elizabeth A. Fegan